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*Attorney for Plaintiff Sierra Club*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION

WESTERN ORGANIZATION OR  
RESOURCE COUNCILS, *et al.*,

Plaintiffs,

vs.

UNITED STATES BUREAU OF  
LAND MANAGEMENT,

Defendant.

Case No. 4:20-cv-76-BMM-JTJ

**DECLARATION OF NATHANIEL  
SHOAF IN SUPPORT OF  
MOTION FOR ADMISSION *PRO  
HAC VICE* OF NATHANIEL  
SHOAF**

Pursuant to L.R. 83.1(d)(3), I, Nathaniel Shoaff, respectfully apply to appear *pro hac vice* as counsel for Sierra Club in this matter. In support of this application, I declare as follows:

1. I am a resident of Vermont. My office address, located at Sierra Club headquarters, is Sierra Club, Environmental Law Program, 2101 Webster Street, Suite 1300, Oakland, CA 94612, (415) 977-5610, [nathaniel.shoaff@sierraclub.org](mailto:nathaniel.shoaff@sierraclub.org). I will pay local counsel's electronic filing account and simultaneously with this filing, the required admission fee as shown on this Court's website.
2. I am proficient in electronic filing in the U.S. Federal District Court for the District of Montana.
3. I am a member in good standing and am eligible to practice in the following courts: the U.S. District Court for the District of Colorado, admitted in 2019; the U.S. Court of Appeals for the Tenth Circuit, admitted in 2015; the U.S. District Court for the District of Columbia, admitted in 2012.
4. I am not currently suspended or disbarred in any other court.
5. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under the Federal Rules of Civil Procedure 11 or 37(b), (c), (d) or (f) or their state equivalent.

6. Within the two years preceding the date of this application I applied for *pro hac vice* admission to this Court in *Montana Environmental Information Center v. Bernhardt*, No. 1:19-cv-130-SPW-TJC (D. Mont.). In 2016, I was granted admission *pro hac vice* in *Western Organization of Resource Councils v. U.S. Bureau of Land Management*, 4:16-cv-21-BMM (D. Mont.), which gave rise to this litigation.
7. I understand that *pro hac vice* admission in this Court is personal to me only and not to the Sierra Club, and that I will be held fully accountable for the conduct of this litigation in this Court.
8. Pursuant to Montana Rules of Professional Conduct 8.5, I hereby certify in writing and under oath to this Court that, except as to Rules 6.1 through 6.4, I will be bound by the Montana Rules of Professional Conduct in my practice of law in this State and will be subject to the disciplinary authority of this State. I further certify that I will mail a copy of this declaration, contemporaneously, to the business offices of the State Bar of Montana in Helena, Montana.
9. I designate Shiloh Hernandez, Western Environmental Law Center, 103 Reeder's Alley, Helena, Montana 59601, (406) 443-3501, [hernandez@westernlaw.org](mailto:hernandez@westernlaw.org) as the member of the Bar of this Court with

whom the Court and all parties may readily communicate regarding the conduct of the case and upon whom papers shall be served.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated this 24th day of September, 2020.

/s/ Nathaniel Shoaff

Nathaniel Shoaff (*pro hac vice pending*)

Sierra Club

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